

EXHIBIT C



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August 7, 2024

Via Email: tmcnair@mcnairlaw.com

Timothy D. McNair, Esquire
Law Office of Timothy D. McNair
821 State Street
Erie, PA 16501

RE: Spencer, Randy J. v. Matt McSparren, et al
Docket No. 1:23-CV-00036
Claim No. 10167940
Our File No. 2330-8563

Dear Attorney McNair:

We have been corresponding, via email, regarding two separate and distinct discovery issues. On the one hand, Defendants have been actively seeking a response to discovery propounded on Plaintiff in November of 2023, to meet the upcoming deadline of August 9, 2024. On the other hand, as of Monday, August 5, 2024, Plaintiff is seeking a withdrawal of all the objections Defendants lodged against Plaintiff's discovery, which was served in April of 2024.

I have already expressed a willingness to revisit Defendants discovery responses, however, that is an issue, separate and apart, from Plaintiff's obligation to answer discovery in the first instance. If you wish to extend the discovery deadline, as I have proposed and provide Plaintiff the opportunity to respond to discovery and be deposed, please advise by 10:00 am on August 8, 2024 – in that instance we can fashion a joint motion.

Very truly yours,

/s/ Justin A. Zimmerman
Justin A. Zimmerman, Esquire

JAZ/mrp